BEFORE THE DEPARTMENT OF TRANSPORTATION OFFICE OF THE SECRETARY WASHINGTON, D. C.

INTRA-ALASKA BUSH AND | Docket OST-2003-14694
MAINLINE SERVICE MAIL RATES | Docket OST-2003-14695

COMMENTS IN RESPONSE TO PRELIMINARY FINDINGS AND SHOW CAUSE ORDER

Tanana Air Service Response October 21, 2003

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After reviewing the Show Cause Order 2003-10-10, the following comments are submitted:

Issue 3: Submission of data as required on Appendix A is going to be a very difficult process. The data required are not clear, i.e., Non-Scheduled passenger and freight data Inbound. BTS has not had their system on the Internet since before this order was published and there is no guidance for the completion of this appendix. Also, the exclusion of carriers that do not expect to qualify for bypass mail will skew the data as incomplete for a given market.

Issue 5: All other qualifications for a carrier to receive bypass mail has been and is still three flights a week. For the Department to arbitrarily reduce the requirement for a 19-seat passenger Part 121 aircraft to be flown into a market once a week to qualify as a Part 121 Bush rate is unreasonable and establishes a precedence that is unwarranted.

As stated in Issue 3, the completion of Appendix A in any meaningful manner, with the instructions provided, is impossible at this time to complete by November 1, 2003. BTS does not have their website on-line concerning Alaska Data, the requirement for inbound N-Skd Pass and Freight is unclear, and the communities are assumed to be only the hubs.

Thank you for the opportunity to comment on these issues.